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11 Attorney for Christopher Balodimas

12  
13 **UNITED STATES DISTRICT COURT**  
14  
15 **DISTRICT OF NEVADA**

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 CHRISTOPHER BALODIMAS,

20 Defendant.

21 Case No. 2:18-cr-257-JCM-GWF

22 **STIPULATION TO CONTINUE**  
**SENTENCING HEARING**  
(Second Request)

23 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
24 Trutanich, United States Attorney, and Linda Mott, Assistant United States Attorney, counsel  
25 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel  
26 Lazo, Assistant Federal Public Defender, counsel for Christopher Balodimas, that the  
Sentencing Hearing currently scheduled on March 21, 2019 at 10:00 a.m., be vacated and  
continued to a date and time convenient to the Court, but no earlier than twenty-one (21) days.

This Stipulation is entered into for the following reasons:

1. Mr. Balodimas' presentence investigation report (PSR) was disclosed to the  
parties on February 14, 2019. Informal objections are due to probation on February 28,  
2019. Defense counsel needs time to review the PSR with Mr. Balodimas. She will not be able

1 to go to the jail in order to do so until February 26, 2019. Defense counsel is also trying to  
2 coordinate a phone interview between probation and Mr. Balodimas' mother in order for her to  
3 verify the information provided in the PSR.

4 2. Defense counsel also anticipates that she may need to file formal objections. If  
5 so, additional time will be needed to conduct legal research and draft the objections.

6 3. The defendant is in custody and does not oppose a continuance.

7 4. The parties agree to the continuance.

8 This is the second request for a continuance of the sentencing hearing.

9 DATED this 15<sup>th</sup> day of February, 2019.

10  
11 RENE L. VALLADARES  
Federal Public Defender

12 NICHOLAS A. TRUTANICH  
United States Attorney

13 /s/ *Raquel Lazo*  
14 By \_\_\_\_\_  
15 RAQUEL LAZO  
Assistant Federal Public Defender

16 /s/ *Linda Mott*  
17 By \_\_\_\_\_  
18 LINDA MOTT  
19 Assistant United States Attorney

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

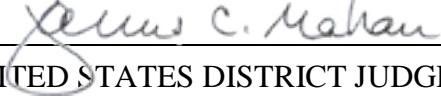
UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
CHRISTOPHER BALODIMAS,  
Defendant.

Case No. 2:18-cr-257-JCM-GWF

**ORDER**

IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for Thursday, March 21, 2019 at 10:00 a.m., be vacated and continued to April 16, 2019 at the hour of 10:00 a.m. ; or to a time and date convenient to the court.

DATED February 20, 2019.

  
UNITED STATES DISTRICT JUDGE